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Intertribal COUP has developed a plan for Intertribal wind energy development as an additional method of addressing environmental justice and economic restoration for the Missouri Basin Tribes. This plan outlines a road map for tribal wind in the northern Great Plains that provides for distributed tribal generation that meets reservation needs for local power and for potential export projects ranging from 30-150 MWs per reservation. This Intertribal environmental justice plan for community revitalization through the Intertribal Wind Demonstration Project that envisions an ultimate total of a potential of 3,000 MWs distributed over six states in the northern Great Plains (MT, WY, ND, SD, NE and MN) within the decade. This plan, which begins with an intertribal 80 MW distributed generation project on up to 8 North and South Dakota reservations, has been competitively selected by the Interagency Working Group on Environmental Justice. Intertribal COUP is actively engaged with a dozen federal agencies, including WAPA, in

#### Task 1: Analyze Non-Firm Transmission Potential Relative to New Wind Generation

Intertribal COUP has long held the opinion that the WAPA transmission lines have more unused capacity at certain hours and seasons of the year and strongly agrees that this should be included in the study and addressed from a regional generation and scheduling perspective

The study of the three corridors and impact of new transmission line construction from the WAPA substations in ND, from the Ft. Thompson and Ft. Randall to the identified eastern locations in SD and MN is very necessary and hopefully can include projects for the Mandan, Hidatsa, and Arikara Tribes, as well as the Spirit Lake Tribe and the Standing Rock Sioux Tribe. The above referenced new transmission lines and proposed new lines from Ft. Thompson south to Ft. Randall and to Grand Island, NE are also supported by COUP for inclusion in the study. The Ft. Thompson, Mission, and Bonesteel areas can include Tribal wind projects for the Lower Brule, Crow Creek, and Rosebud Sioux Tribes.

We also request that new transmission lines from north and south of Pierre, SD be considered to include the wind projects for the Cheyenne River Sioux Tribe and the Lower Brule Sioux Tribes to interconnect to Ft. Thompson, Ft. Randall, and to Grand Island, NE and eastward to Iowa.

#### Task 2: Assess Potential of Transmission Technologies Relative to New Wind Generation

Intertribal COUP supports the study of thermal capacity, voltage, reliability, safety, new conductor materials through new technology applications to increase transmission capacity and power demand scheduling to accommodate new wind generation that can include Tribal projects in the region.

#### Task 3: Study Interconnection of New Wind Generation

Intertribal COUP is very appreciative of the inclusion of Tribal projects in the Garrison, ND, Ft. Thompson and Mission, SD areas in the 50, 150, 250, and 500 MW levels. We also request that interconnection studies be included for 10 MW level projects at five other Tribal locations as identified in our Wind Demonstration Project plan for interconnection to smaller WAPA substations adjacent to the wind sites. These projects are on the Spirit Lake and Standing Rock in ND and SD, Cheyenne River, Flandreau, Sisseton-Wahpeton in SD, and the Omaha reservations, in NE. We also request that being in the interconnection study queue not be a requirement for Tribal wind projects to be included in study.

#### Task 4: Study the Delivery to Market of New Wind Generation

Intertribal COUP is hopeful of inclusion of Tribal projects in the four most favorable zones for aggregation delivery studies. The above described plan for nine 10 MW projects interconnected to WAPA substations and potential for power purchase by WAPA for delivery to complement existing hydropower allocations to cities and other utilities be considered as an innovative aggregate delivery of windpower to public and private utilities. Different options for firm and non-firm power delivery and displacement scheduling alternatives could be included.

determining how tribes can achieve this ambitious plan. The Intertribal COUP Intertribal Wind Development Plan for 80 megawatts of wind power in 10 megawatt clusters on 8 reservations in the Dakotas has been designated as an Interagency Working Group Environmental Justice Revitalization Demonstration Project 3-03. <  
<http://epa.gov/compliance/resources/publications/ej/iwg-2003.pdf> >

As related in our March, 2004 comments on the scope of the WAPA Dakotas Wind Study, Intertribal COUP reminds WAPA that all agencies of the federal government have a trust responsibility to work with the Tribes in a government to government relationship to protect and develop natural resources and assist in the restoration of economies on Tribal lands. This relationship of trust and economic treaty partnerships is based on the U.S. Constitution and various treaties with the Indian Nations and subsequent congressional laws supporting commerce among the Tribes, the federal government and the private sector.

Our earlier comments also addressed global warming and the climate concerns relative to CO2 emissions and changing precipitation patterns and the impact on Missouri River water levels and hydropower generation. Intertribal COUP has participated in the national assessment on climate change through work with the U.S. Global Change Research Program including the report entitled, Native Peoples, Native Homelands Climate Change Workshop. The precipitation patterns over the past 12 yrs have been evidenced by increases east of the Missouri River and severe drought west of the Missouri and throughout the western United States.

Intertribal COUP shares the concerns of the global science community and 150 Cities in the United States, that CO2 emissions must be reduced through a number of policy changes, including increased energy efficiency and increased development of renewable energy sources. We are working with a number of city governments in a Tribal/City Alliance in an Energy Independence Day Campaign to reduce emissions develop renewable energy resources on Tribal lands. For all of us in the Missouri Basin, that means wind energy development.

American Indian tribes enjoy a tremendous untapped energy potential in reservation wind and solar resources. In the northern plains, Tribal renewable energy development offers the opportunity for building sustainable reservation economies based upon the clean and inexhaustible energy resources found in the ocean of wind that crosses the Great Plains every day. Throughout the west, Tribes are interconnected to federal WAPA/BPA grids for off-reservation energy sales with zero emissions. Distributed Indian owned wind and solar projects could help meet federal, state and tribal renewable portfolio standards (RPS). Based upon the 1987 estimated wind power potential maps developed by the Department of Energy, only 5% of American Indian lands could produce some 667 gigawatts of wind energy. This number exceeds the installed electrical capacity presently utilized in the United States.

Intertribal COUP is generally supportive of the tasks included in the study, although somewhat limited in scope and identification of Tribal/Federal relationships, provided that the Tribes have continued opportunity to participate in the study relative to inclusion of Tribal wind project plans and transmission needs. The following are specific Tribal project comments relative to support and inclusion in the Study Task Areas:

The Tribal wind projects sites are extremely well positioned for interconnection to the WAPA substation locations and transmission lines. We fully support the return of the WAPA transmission grid system to a minimum of 50% capacity for purchase and delivery of renewable energy.

As a final comment, Intertribal COUP is aware that In the past five years, Western has seen a dramatically accelerating increase in its purchase of supplemental or replacement power to fulfill its customers' long-term contractual requirements and a decrease and disappearance in its sale of surplus power. We maintain that the COUP plan for Intertribal wind generation at each reservation could decrease the WAPA outlay for supplemental power purchase and significantly impact the Tribal economies in a true and complementary treaty partnership. There exists sufficient federal authority to purchase wind energy from the Tribes. We request that WAPA recognize the Tribes and the trust responsibility to assist in economic development and find a way to realize the full value of commerce with Tribal governments.

Thank you for your inclusion of Tribal wind projects in this study and your careful consideration of our requests for specific attention to uniquely Tribal concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick Spears", with a stylized, flowing script.

Patrick Spears, President  
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